Serial No. 10/086,866 Art Unit 2664

REMARKS

Claims 2-7 and 9-12 have been cancelled. Claim 1 has been amended to include the limitations of claim 3, and to recite that the connection table is dynamically changed if the switch hardware changes. Support for the latter is found in the description at paragraphs [0023] and [0024] for example, where the insertion of a switch fabric card results in the creation of connection tables. New claim 13 includes the limitations of previous claim 8. New claim 14 recites that different connection tables are maintained, and that simultaneous changes to connections are affected by using an alternate connection table. Support for this is found, for example, in Figure 4. No new subject matter has been introduced to the application.

The Examiner has rejected claims 1-12 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,810,427 issued to Cain. Claim 1 has been amended to include the limitation that the connection table is generated based on switch hardware related information stored within switch hardware. The Applicant respectfully submits that this is a feature not taught by Cain. The Examiner has cited column 5 lines 8 to 15 of Cain (with reference to former claim 3). However, Cain is simply teaching that the forwarding plane is a combination of hardware, software, and firmware elements. Cain does not disclose generating connection tables <u>based</u> on the nature of the switching hardware, as is recited in amended claim 1 of the present application.

Claim 8 is dependent on claim 1, and includes the limitation discussed above and not taught by Cain. Furthermore, claim 8 includes the limitation that the switch card elements support multiple configuration tables. The Applicant respectfully submits that this is a feature not taught by Cain. The Examiner has cited column 19 lines 24 to 37 of Cain. However, Cain is describing the use of multiple MIBs. As is known in the art, each of multiple MIBs describes a different configuration or management data record, and not multiple instances of configuration tables which allow generation of multiple connection tables.

The Applicant therefore respectfully submits that claims 1 and 8 are not anticipated by Cain, as Cain does not teach each and every element of the claims.

Serial No. 10/086,866 Art Unit 2664

New claim 13 includes the limitations discussed above with respect to claim 8. New claim 14 also includes the limitation that additional versions of the connection table are generated so as to allow simultaneous changes to multiple connections by routing commands from said connection manager to switch card elements based on one of the additional versions of said connection table. The Applicant submits that this is a feature not taught by Cain, and that claims 13 and 14 are not anticipated by Cain.

In view of the foregoing, it is believed that the claims at present on file and as amended herein are in condition for allowance. Reconsideration and action to this end is respectfully requested.

Respectfully submitted,

S. Mark Budd

Registration No. 53,880

mark Budd

Agent of Record

MARKS & CLERK P.O. Box 957, Station B Ottawa, ON K1P 5S7 (613)236-9561